

REDACTED – FOR PUBLIC INSPECTION
**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

In the Matter of)	
)	
Revision of the Commission's Rules To)	
Ensure Compatibility with Enhanced 911)	CC Docket No. 94-102
Emergency Calling Systems)	
)	
Request for Waiver By Southern)	
Communications Services d/b/a)	
SouthernLINC Wireless)	

To: The Commission

SOUTHERNLINC WIRELESS E911 PHASE II QUARTERLY REPORT:

AUGUST 1, 2006

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Dated: August 1, 2006

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**SOUTHERNLINC WIRELESS E911 PHASE II QUARTERLY REPORT:
AUGUST 1, 2006**

Pursuant to the *Order* of the Federal Communications Commission ("FCC" or "Commission") of November 3, 2005,¹ Southern Communications Services, Inc. d/b/a SouthernLINC Wireless ("SouthernLINC Wireless") hereby provides the Commission its quarterly report regarding the status of its efforts to achieve ninety-five percent penetration of automatic location identification (ALI)-capable handsets among its subscribers pursuant to Section 20.18(g)(1)(v) of the Commission's Rules, 47 C.F.R. § 20.18(g)(1)(v). SouthernLINC Wireless notes that it filed a Petition for Reconsideration and Clarification of the *Order* on December 5, 2005, which is still pending before the Commission, and clarifies that this quarterly status report is submitted separate from and

¹ / *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems; Request for Waiver by Southern Communications Services, Inc. d/b/a SouthernLINC Wireless*, CC Docket No. 94-102, Order, FCC 05-188 (rel. Nov. 3, 2005) ("Order") (granting SouthernLINC Wireless until November 3, 2006, to achieve ninety-five percent penetration of location-capable handsets among its subscriber base and requiring the filing of quarterly status reports).

without prejudice to its pending Petition.² SouthernLINC Wireless also notes that, more recently, it has filed an additional petition with the Commission requesting a further waiver of the deadline to achieve ninety-five percent penetration of location-capable handsets among its customer base.³

I. BACKGROUND

On July 26, 2005, SouthernLINC Wireless, a “qualified Tier III carrier” as that term is defined in Section 107 of the *ENHANCE 911 Act*,⁴ submitted a Request for Waiver requesting a limited extension of the Commission’s December 31, 2005, handset deployment deadline to allow SouthernLINC Wireless an additional twenty-four months to achieve ninety-five percent penetration of location-capable handsets among its subscriber base.⁵ As set forth in the Request for Waiver and subsequent filings, SouthernLINC Wireless faces numerous challenges in its efforts to achieve the required level of penetration of location-capable handsets, including (i) a latent software defect in the Motorola A-GPS-equipped handsets used by SouthernLINC Wireless subscribers that rendered all A-GPS services in these handsets unusable for E911 location in July 2004; (ii) the substantial portion of handsets assigned to enterprise or government accounts that typically have long-term equipment replacement cycles and are both reluctant and resistant to upgrading from their current handsets to new location-capable handsets; and

² / Petition for Reconsideration and Clarification of SouthernLINC Wireless, CC Docket No. 94-102, filed December 5, 2005 (“Petition”).

³ / Request for Further Waiver by SouthernLINC Wireless, CC Docket No. 94-102, filed July 24, 2006 (“Request for Further Waiver”).

⁴ / National Telecommunications and Information Administration Organization Act – Amendment, Publ. L. No. 108-494, 118 Stat. 3986 (1994) (“*ENHANCE 911 Act*”).

⁵ / Request for Waiver by SouthernLINC Wireless, CC Docket No. 94-102, filed July 26, 2005 (“Request for Waiver”).

(iii) the number of SouthernLINC Wireless subscribers who utilize and rely on the range and coverage of higher-power 1 watt and 3 watt phones and who are unwilling to upgrade to a lower-power (0.6 watt) location-capable handset, which could decrease their ability to receive any communications services – including emergency services – in remote areas.⁶

On November 3, 2005, the Commission released its *Order* granting SouthernLINC Wireless a limited ten-month extension of the ninety-five percent handset penetration deadline and requiring SouthernLINC Wireless to file status reports on a quarterly basis. On December 5, 2005, SouthernLINC Wireless filed a Petition for Reconsideration and Clarification of the *Order*. This Petition is still pending before the Commission. On July 24, 2006, SouthernLINC Wireless filed a Request for Further Waiver, seeking an additional extension of the ninety-five percent penetration deadline until December 31, 2007. The information contained in the Request for Further Waiver is hereby incorporated by reference as part of this quarterly status report.

II. INFORMATION REGARDING THE STATUS OF SOUTHERNLINC WIRELESS' E911 PHASE II DEPLOYMENT EFFORTS

In accordance with the *Order*,⁷ SouthernLINC Wireless provides the Commission with the following information regarding its E911 Phase II deployment status and efforts.

⁶ / See, e.g., Request for Waiver at 2 – 3; See also SouthernLINC Wireless Notice of *Ex Parte* Presentation, CC Docket No. 94-102, filed September 9, 2005; SouthernLINC Wireless Response to Request for Additional Information Supporting its Request for Waiver of the E911 Phase II Handset Deployment Deadline, CC Docket No. 94-102, filed Oct. 26, 2005 (“Supplemental Filing”).

⁷ / *Order* at ¶ 23.

A. Number and Status of Phase II Requests from PSAPs

As of the date of this report, SouthernLINC Wireless had received 103 requests for Phase II service out of a total of 298 PSAPs in its service territory. SouthernLINC Wireless has completed deployment in response to 89 of these requests, with 14 requests still pending. With one exception, all pending requests are anticipated to be deployed within the six month deployment deadline. SouthernLINC Wireless has experienced delays in deployment with one PSAP due to issues involving the incumbent local exchange carrier. SouthernLINC Wireless has communicated regularly with the affected PSAP regarding deployment and is ready to complete deployment once the PSAP and the local exchange carrier have resolved their technical issues. A chart summarizing SouthernLINC Wireless' deployment of E911 Phase I and Phase II service to PSAPs is provided as Attachment A.

Pending Phase II requests are detailed in the chart enclosed as Attachment B. Because SouthernLINC Wireless has chosen to deploy a handset-based solution to provide caller location data to PSAPs, it is currently capable of providing E911 Phase II service to any and all Phase II-capable PSAPs in its service territory.

B. Estimated Dates on Which Phase II Service Will Be Available to PSAPs Served by SouthernLINC Wireless' Network

As described above, SouthernLINC Wireless is capable of providing Phase II service to any requesting Phase II-capable PSAP in its service territory. Estimated deployment dates for pending Phase II requests are provided in the chart enclosed as Attachment B.

C. Status of Coordination Efforts With PSAPs for Alternative Handset Penetration Dates

SouthernLINC Wireless remains in constant communication with all PSAPs in its territory regarding E-911 services, its ability to provide Phase I and Phase II service, and any problems that may arise that affect service availability. These communications may be written or verbal, and they include information on SouthernLINC Wireless' ability to provide Phase II service to its customers and the degree to which its customers can benefit from Phase II capabilities. SouthernLINC Wireless' 911 services coordinator interacts with the 911 community on a regular basis, including attending meetings where she provides verbal updates on SouthernLINC Wireless' Phase II deployment status. Depending on the nature of the meeting, such information may be provided to all attendees in the form of a general announcement or may be targeted to interested parties in specific discussions. Since the submission of SouthernLINC Wireless' 2nd Quarter 2006 Report,⁸ the 911 services coordinator has provided updates at the Northwest Alabama 911 Directors quarterly meeting (May 11, 2006) and the Alabama NENA quarterly meeting (July 27, 2006).

As described in its previous quarterly status reports, SouthernLINC Wireless has undertaken a communications program for Phase II-capable PSAPs in its service territory focusing on the customer handset penetration issue.⁹ Specifically, SouthernLINC Wireless is providing these PSAPs with regular updates every two months via U.S. mail on the number of SouthernLINC Wireless customers using location-capable handsets and

⁸ / SouthernLINC Wireless E911 Phase II Quarterly Report: May 1, 2006, CC Docket No. 94-102, filed May 1, 2006 ("2nd Quarter 2006 Report").

⁹ / *See, e.g., Id.* at 5.

its progress towards the goal of ninety-five percent penetration of location-capable handsets.

In addition, SouthernLINC Wireless always provides PSAPs with written confirmation of Phase II implementation once all activities, including testing, have been completed. These communications also include information on the number of SouthernLINC Wireless customers using location-capable handsets and its progress towards the ninety-five percent penetration goal. These PSAPs will also receive the regular mail updates described above.

D. Efforts to Encourage Subscribers to Reflash or Upgrade Handsets

To communicate with customers about E-911 services and capabilities, SouthernLINC Wireless launched a bill message communications plan for 2006 to provide information to its customers about E-911. The bill message runs twice each quarter. A sample of the language that is being used in the message appearing on customer bills is provided as Attachment C to this report. This bill message is designed to draw customers' attention to the issue of wireless E-911 service – as well as the need for an A-GPS-capable phone – and send them to a dedicated area on the SouthernLINC Wireless website for more details on E-911 services, including the availability of basic, Phase I, and Phase II services across SouthernLINC Wireless' service territory and information on which handset models are location-capable. A link to information on SouthernLINC Wireless' current handset promotions is also featured at this location so that customers can make decisions on handset upgrades, should they choose to do so. This section of the website was launched in early February 2006. In the second quarter, SouthernLINC Wireless also added a message about A-GPS handsets and 911 service to

its “on hold” message at its customer support center, providing customers with another avenue from which to learn about the importance of location capabilities in emergency situations.

SouthernLINC Wireless also has a very attractive handset promotion program underway for the third quarter of 2006, which will help to encourage customers to upgrade to new, location-capable handsets. Under this program, SouthernLINC Wireless is offering rebates on nearly all of its handsets, leading to two handsets being made available for free (post-rebate) and other handsets having significantly reduced prices. Most existing customers in good standing can take advantage of these rebate offers.

To further encourage existing customers to upgrade to A-GPS-capable handsets, SouthernLINC Wireless is preparing a special offer that includes free minutes for upgrading customers. This offer will be made available to customers through a direct mail program, which is scheduled to take place in mid-August 2006. A copy of the planned mail piece is included in this report as Attachment D. Additional efforts undertaken by SouthernLINC Wireless to encourage customers to reflash or upgrade their handsets are described in more detail in SouthernLINC Wireless’ Request for Further Waiver.¹⁰

E. Extent of Subscribers Having Higher-Power, Non-A-GPS Handsets

Approximately [] percent of SouthernLINC Wireless customers currently use high-power handsets which are not location-capable.

¹⁰ / Request for Further Waiver at 10 – 12.

F. Percentage of Customers With Location-Capable Handsets

Approximately sixty-four percent of SouthernLINC Wireless customers currently use location-capable handsets.

G. Status in Achieving Compliance

Although SouthernLINC Wireless faces numerous challenges in its efforts to achieve ninety-five percent penetration of location-capable handsets among its subscribers, it is committed to achieving full compliance as quickly as possible and has made significant progress towards this goal. As a result of the variety of outreach, promotional, and marketing efforts it has undertaken, SouthernLINC Wireless has succeeded in increasing its level of penetration of location-capable handsets from approximately forty-three percent on October 31, 2005, to approximately sixty-four percent as of August 1, 2006. SouthernLINC Wireless is now building on these positive results in order to further accelerate customer adoption of location-capable handsets through additional promotional and outreach measures such as those described in Section II. D. above.

SouthernLINC Wireless believes that it will be able to achieve the ninety-five percent penetration level and will continue to put forth substantial effort and resources into doing so. However, SouthernLINC Wireless, despite its best efforts, is not on schedule to achieve this level by the revised deadline of November 3, 2006. As set forth in its pending Petition for Reconsideration and Clarification, SouthernLINC Wireless does not believe that the ten-month extension granted by the Commission provides sufficient time in light of the extraordinary circumstances of its situation.¹¹ As described

¹¹ / Petition at 16 – 18.

in its Request for Further Waiver, SouthernLINC Wireless, while having made every effort to achieve compliance as rapidly as possible, requires additional time to reach the ninety-five percent penetration level due to the extraordinary circumstances that it has faced.

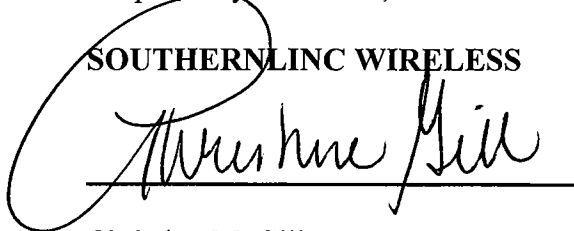
III. CONCLUSION

As demonstrated above, SouthernLINC Wireless is continuing to put forth substantial effort and resources into migrating as much of its subscriber base as possible to location-capable handsets, and it is committed to achieving full compliance with the Commission's handset penetration requirement as quickly as possible.

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Respectfully submitted,

SOUTHERNLINC WIRELESS

A handwritten signature in black ink, appearing to read "Christine M. Gill", is written over a horizontal line. The signature is fluid and cursive, with the first name "Christine" being more prominent.

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Dated: August 1, 2006

ATTACHMENT A

Deployment of E911 Phase II Services to PSAPs

SouthernLINC Wireless
911 Deployments

Status as of July 24, 2006		Phase 1 Requests					Phase 2 Requests				
911 Implemen tation	Total PSAP's	Total Rec'd	Total Pending	Total Deployed	2006 Deployments	Total Past Deployment Deadline	Total Rec'd	Total Pending	Total Deployed	2006 Deployments	Total Past Deployment Deadline
AL	83	67	1	66	3	0	44	1	43	10	0
FL	12	10	0	10	3	0	10	2	8	2	0
GA	179	90	15	75	11	0	44	11	33	16	0
MS	24	11	0	11	3	0	5	0	5	2	0
Total	298	178	16	162	20	0	103	14	89	30	0

ATTACHMENT B

Pending PSAP Phase II requests

Phase 2 Outstanding Request Status as of 7/24/2006

State	PSAP Name	P2 6 Mo Deployment Due Date	Scheduled P2 Deployment Date	Notes
AL	Chambers County AL 911	15-Nov-06	26-Jul-06	Well ahead of schedule
FL	Gadsden County FL 911	26-Oct-06	TBD	PSAP not ready until mid-October/Equipment vendor issues
FL	Santa Rosa County FL 911	26-Jul-06	TBD	PSAP not ready/LEC issues
GA	Decatur County GA 911	30-Nov-06	TBD	Provisioning complete/Working w/ PSAP to finalize test/deployment date
GA	Dooly County GA 911	14-Dec-06	TBD	Provisioning in process/Working w/ PSAP to finalize test/deployment date
GA	Grady County GA 911	30-Nov-06	TBD	Provisioning complete/Working w/ PSAP to finalize test/deployment date
GA	Macon County GA 911	14-Dec-06	TBD	Provisioning in process/Working w/ PSAP to finalize test/deployment date
GA	Marion County GA 911	14-Dec-06	TBD	Provisioning in process/Working w/ PSAP to finalize test/deployment date
GA	Roswell GA, City of	16-Nov-06	TBD	Provisioning complete/Working w/ PSAP to finalize test/deployment date
GA	Schley County GA 911	14-Dec-06	TBD	Provisioning in process/Working w/ PSAP to finalize test/deployment date
GA	Sumter County GA 911	14-Dec-06	TBD	Provisioning in process/Working w/ PSAP to finalize test/deployment date
GA	Taylor County GA 911	14-Dec-06	TBD	Provisioning in process/Working w/ PSAP to finalize test/deployment date
GA	Wayne County GA 911	08-Nov-06	TBD	Provisioning complete/Working w/ PSAP to finalize test/deployment date
GA	Webster County GA 911	14-Dec-06	TBD	Provisioning in process/Working w/ PSAP to finalize test/deployment date

ATTACHMENT C

Bill Message

Bill Message

Safety Continues to be a Priority for SouthernLINC Wireless!

SouthernLINC Wireless is expanding the area in our footprint where Enhanced 911 (E911) service is available. E911 service provides emergency response agencies important information that helps them dispatch assistance to you, such as the telephone number from which a call to 911 is placed. In areas where the emergency response agencies have updated their equipment, they can also receive the approximate location of the caller. This information can be critical to obtaining help rapidly, but it is available only if your phone has A-GPS-capabilities. Visit your local SouthernLINC Wireless store or dealer today to make sure that you have an A-GPS-capable phone. To learn what areas E911 is now available in our SouthernLINC Wireless footprint, visit www.southernlinc.com.

ATTACHMENT D

Customer Letter



A Southern Company



Sample Name
Address Line 1
Address Line 2
City, State 00000

Dear [Name]:

Your wireless phone can be an important tool during an emergency. To provide customers with an additional degree of safety, SouthernLINC Wireless has incorporated Assisted GPS technology into its wireless phones. When a SouthernLINC Wireless customer using an A-GPS capable wireless phone dials 911 for emergency assistance, this technology enables emergency personnel in a 911 Call Center to identify the caller's approximate location to within 500 feet, if the 911 Call Center has the proper equipment.

With approximate location information, a properly-equipped 911 Call Center can more accurately dispatch emergency assistance. That means you have a better chance of receiving help rapidly.

This innovation could save precious seconds in emergencies when seconds count most. So, SouthernLINC Wireless is making an unprecedented offer to help all customers upgrade their equipment and acquire an A-GPS compatible phone.

Is Your Phone Compliant? Here's How To Tell

Phone models that may need to be upgraded are listed below. If your phone model appears on either of these two charts, please visit a SouthernLINC Wireless store or participating dealer to upgrade your equipment.

THESE PHONES ARE NOT A-GPS CAPABLE

i30sx	i35s	i50s	i55sr
i60c	i80s	i85s	i90c
i95cl	i500plus	i550plus	i700plus
i750plus	i1000plus	LM100	m370
m470	im1000	im1100	io1000
io1500	ir1200	i280	i370
r470	i390	i600	i1000
i2000	L3000	L3000e	

THESE PHONES MAY NOT BE A-GPS CAPABLE

IF PURCHASED BEFORE NOVEMBER 2004

i58sr	i88s	i205	i215
i285	i305	i315	i325
i415	i450	i530	i710
i730	i733	i736	i830
i835	i855	i875	

OVER, PLEASE

5555 Glenridge Connector, Suite 500
Atlanta, GA 30342
www.southernlinc.com

Special Equipment Opportunity For SouthernLINC Wireless Customers

SouthernLINC Wireless is now offering two FREE options for upgrading to an A-GPS compatible phone:

- Renew with a two-year contract now and receive your choice of a FREE* i205 or i670 phone (after your \$50 mail-in rebate), PLUS:
- Get 400 anytime cellular minutes FREE** – 200 per month for two months just for upgrading to any A-GPS capable phone!

To get these two great offers, you must upgrade before October 4, 2006. And enjoy the added security that comes from knowing you can always count on your SouthernLINC Wireless service to help keep you and your family safe.

Sincerely,



Bob Dawson
President and CEO

P.S. Act now for your A-GPS compliant phone PLUS 400 FREE anytime minutes. Stop by your SouthernLINC Wireless store or participating dealer today!

* After \$50.00 mail-in rebate. Two-year service agreement required. A \$200 early termination fee and a \$35 activation fee apply. Taxes, fees, and/or surcharges, including, without limitation, universal service fees and E911 fees, will apply. Limited time offer.

** 400 minutes will be available at the beginning of subscriber's next bill cycle and end at the end of two billing cycles. Minutes will be for Anytime Usage Cellular Minutes. If your plan contains weekday and night and weekend minutes, package minutes will be available during weekdays only. Does not include SouthernLINC Wireless Roaming minutes or Long Distance. If a subscriber is not set up to use cellular and wants to use the minutes, they must call Customer Support to add cellular service. Subject to availability.

Certain restrictions apply. Offer valid on purchases made by October 4, 2006. © 2006 Southern Communications Services, Inc. d/b/a SouthernLINC Wireless. All rights reserved. SouthernLINC Wireless, the SouthernLINC Wireless logo and other members of the "LINC" family of marks are the property of Southern Communications Services, Inc. d/b/a SouthernLINC Wireless. Southern Company is a proprietary mark of The Southern Company. Motorola and the stylized M logo are registered in the U.S. Patent and Trademark Office. All other product or service names are the property of their respective owners. All rights reserved.